

UNITED STATES DISTRICT COURT  
District of Massachusetts

Civil Action  
No. 05-10078-DPW

---

PETER A. CRAWFORD, Plaintiff )  
  )  
  )  
v.                                       )  
  )  
WOLVERINE, PROCTOR & SCHWARTZ, INC., )  
    Steven F. Chilinski, Deepak S. Kulkarni, )  
  )  
Defendants                           )  
  )

---

**JOINT MOTION TO EXPAND PAGE LIMITS  
FOR SUMMARY JUDGMENT MOTIONS**

NOW COMES the Plaintiff and Defendants in the above-captioned action (collectively the “Parties”) and jointly move that this honorable Court, pursuant to Local Rule 7.1(b)(4) grant plaintiff, and defendants collectively, leave to file motions for Summary Judgment (due on March 17, 2006) of up to forty (40) pages. In support thereof, the Parties state that the issues are complex, that the amount in controversy is approximately \$1.7 million, and that neither party believes that the twenty page limit specified by Local Rule 7.1(b)(4) will be sufficient adequately to present, for the benefit of the Court, the facts and arguments underlying their motions.

Defendants further state that they will be moving for summary judgment on at least five of plaintiff’s discrete causes of action – and each particular cause of action will need to be addressed in separate legal arguments. Furthermore, at least one of

defendants' legal arguments involves a statutory interpretation question of first impression -- which will necessitate relatively detailed legal exposition.

Respectfully submitted,

PETER A. CRAWFORD,

Plaintiff *Pro Se*

/s/ Peter A. Crawford  
23 Newcastle Drive  
Nashua, New Hampshire 03060  
(603) 888-4574

WOLVERINE, PROCTOR & SCHWARTZ,  
INC.; DEEPAK S. KULKARNI and STEVEN  
CHILINSKI,

By their attorneys,

/s/ Jeffrey D. Kuhn  
Mark M. Whitney  
Jeffrey D. Kuhn  
MORGAN, BROWN & JOY, LLP  
200 State Street – 11<sup>th</sup> Floor  
Boston, Massachusetts 02109-2605  
(617) 523-6666  
*Counsel for Defendant*

Dated: March 9, 2006